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June 26, 2015

VIA ECF

Honorable Judge Richard M. Berman  
United States District Judge  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street, Courtroom 17B  
New York, NY 10007

Re: *Rio Tinto plc v. Vale S.A., et al.*, Civil Action No. 14-cv-3042 (RMB) (AJP) (S.D.N.Y.)

Dear Judge Berman:

We write jointly on behalf of all appearing parties to request that the Court enter the enclosed proposed scheduling order, as discussed with Your Honor during the June 23, 2015 status conference in this case. All appearing parties consent to the order.

Respectfully submitted,

/s/ Lewis J. Liman  
Lewis J. Liman

cc: All counsel of record (via ECF)